

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

_____ NETWORK MANAGING SOLUTIONS, LLC,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-295-RGA
)	
AT&T MOBILITY LLC,)	
)	
Defendant.)	
_____)	

STIPULATION AND [PROPOSED] ORDER EXTENDING STAY

WHEREAS, Plaintiff Network Managing Solutions, LLC and Defendant AT&T Mobility LLC agreed to a stay in the present actions on June 20, 2018 (D.I. 143);

WHEREAS, the Court entered the stay as an order of the Court on June 22, 2018 (D.I. 144);

WHEREAS, the parties' stipulated order required the parties to file a joint letter updating the Court or requesting a status conference by August 17, 2018;

WHEREAS, the parties received a first extension from the Court to file the joint letter by October 1, 2018;

WHEREAS, for the same reasons set forth in the stipulated order and the first extension, the parties agree that the above-captioned actions should remain stayed while the negotiations progress, where the parties have made significant progress and are hopeful that they will culminate in the filing of a dismissal of this action;

NOW THEREFORE, Plaintiff Network Managing Solutions, LLC and Defendant AT&T Mobility LLC, subject to approval of the Court, stipulate and agree that the deadline to file the joint letter is extended by four weeks to October 29, 2018.

Dated: October 1, 2018

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (No. 4089)
Michael J. Farnan (No. 5165)
919 N. Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com
Counsel for Plaintiff
Network Managing Solutions, LLC

Respectfully submitted,

SHAW KELLER LLP

/s/ Andrew E. Russell

John W. Shaw (No. 3362)
Jeffrey T. Castellano (No. 4837)
Andrew E. Russell (No. 5382)
I.M. Pei Building
1105 N. Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
jcastellano@shawkeller.co
marussell@shawkeller.com
Counsel for Plaintiff AT&T Mobility LLC

SO ORDERED, this _____ day of _____, 2018.

United States District Judge